

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

CASEY ROSE (26)

CRIMINAL NO. 3:14-CR-367-B

GOVERNMENT'S EXPERT WITNESS DESIGNATION

The United States intends to offer the following individuals as expert witnesses during its case-in-chief:

- Special Agent Eric Wilson,
- Lieutenant Devin Gonzales,
- Forensic Scientist Renea Eckelkamp,
- Senior Special Agent Daniel Meade,
- Task Force Officer Christian Ledbetter, and
- Dallas County Sheriff's Officer Marcella Hale.

The United States provides this notice pursuant to Fed.R.Crim. P. 16. The proposed testimony is admissible evidence under Fed.R.Evid. 702 and 703 and the witnesses have "a reliable basis in knowledge and experience" in their disciplines.

Proposed Expert Witnesses

1. Special Agent Eric Wilson – Special Agent Wilson is a certified peace officer commissioned by the Texas Department of Public Safety. He has been assigned

to the Criminal Investigations Division (CID) since February 1, 2009. Prior to being assigned to CID, he was Highway Patrol Trooper for approximately four and half years. He holds an advanced peace officer's license from the Texas Commission on Law Enforcement Standards and Education. He has experience investigating cases involving illegal narcotics, including but not limited to the procurement and execution of search warrants, interviewing and working with confidential informants, and the detection and identification of various narcotics and other dangerous drugs. He has conducted and assisted in numerous investigations of intrastate, interstate and international illegal drug trafficking schemes, involving the sale, distribution, importation, and smuggling of illegal narcotics and/or the laundering of proceeds derived from drug sales. He is familiar with the drugs distributed by traffickers and how traffickers form conspiracies to obtain and distribute drugs. He is familiar with the roles played by various members of drug organizations, including cell-head leaders, drug couriers, money couriers, and packagers. He is familiar with the coded language traffickers use in an effort to thwart law enforcement and with how they use cellular telephones to further their trafficking. He is familiar with the prices for the various drugs distributed in both bulk and user quantities. He is familiar with identifying drugs, using field-test kits to identify drugs, and with the packaging of drugs. He is familiar with how drugs are manufactured, and produced, and with how distributors dilute drugs with additives. He is familiar with how drug distributors and drug organizations maintain records, with how the organizations transport their drugs and currency, and how they store drugs. He is also familiar with

how organizations protect their drugs and proceeds by maintaining and employing weapons and counter-surveillance. He has participated in the arrests of hundreds of persons, and has testified in both state and federal court. Special Agent Wilson also has extensive experience with firearms and in identifying firearms.

In his proposed testimony, Special Agent Wilson will apply all his experience and familiarity derived from his years in law enforcement to the charges alleged in the indictment including his review of text messages, his interview of the defendant, his overall investigation, controlled purchases, interviews of targets, and the identification of the conspirators, their roles, and the manner and means used to effect the objects of the conspiracy charged.

2. Lieutenant Devin Gonzales – Lieutenant Gonzales exercises a supervisory role over the Texas DPS CID Region 1D3 Major Gang Unit for the Texas Department of Public Safety Criminal Investigations Division. Lt. Gonzales holds a Master Peace Officer's license through the Texas Commission on Law Enforcement. Lieutenant Gonzales is a graduate of the Texas Department of Public Safety All Recruit School/Academy in March 2000 as part of the A-99 Recruit class receiving over eleven hundred (1,100) plus Texas Commission On Law Enforcement hours upon completion of the academy.

In August 2011, Gang Agents and Lt. Gonzales initiated an investigation into the workings of the ARYAN BROTHERHOOD of TEXAS (ABT) in the Dallas and East Texas areas. This investigation led to an ongoing investigation being initiated out of the

Houston, TX Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Field Office titled Operation Wheel Confinement being prosecuted out of the Southern District of Texas (Houston) by the United States Department of Justice (USDOJ) Criminal Division's Organized Crime and Gang Section (OCGS) Special AUSA David Karpel. Texas DPS Gang Agents soon began working side by side with Houston ATF and Homeland Security Investigations (H.S.I.) National Gang Unit (N.G.U.) Special Agents out of the Dallas Field Office. This investigation resulted in the indictment of over seventy five (75) plus ABT members, FEATHERWOODS (female members), and known associates both on the State and Federal level across the State of Texas. During this investigation, Lt. Gonzales participated in hundreds (100s) of hours of surveillance both mobile and stationary, utilized numerous electronic surveillance techniques, coordinated numerous traffic stops, executed numerous search warrants, dealt with numerous ABT associated confidential informants, and arrest warrants both State and Federal, including participating in numerous interviews related to the ABT prison gang.

In February 2013, Lt. Gonzales was selected to represent the Texas DPS CID Gang Unit on the ABT task force to help investigate the Kaufman County District Attorney murders. We were tasked with running down over hundred (100) plus leads related to ABT gang members and their possible role in the two (2) murders. In addition to running down leads both state wide and nationwide, Lt. Gonzales participated in numerous interviews of known confirmed and suspected ABT gang members.

In his proposed testimony, Lt Gonzales will discuss the ABT, its origins, mission, and current composition. He will testify about how an individual becomes a member, what symbols the ABT utilizes, and what kind of activities the ABT engages in. Lt. Gonzales will specifically discuss the evidence linking Casey Rose to the ABT.

3. Forensic Scientist Renea Eckelkamp – FS Eckelkamp is currently employed with the Texas Department of Public Safety Crime Laboratory, where she has worked since September 2013. She has a Bachelor of Science in Chemistry from the University of North Carolina at Wilmington. She has received extensive training in the testing of illegal narcotics and has attended meetings and trainings with other forensic scientists. She will testify that she analyzed certain substances seized during this investigation and she will discuss the results of her analysis. Her testimony will include expert opinion and specialized knowledge.

4. Senior Special Agent Daniel P. Meade – Senior Special Agent (SSA) Meade is employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and has received instruction in both general and specific courses in the recognition and identification of firearms and ammunition as well as their place of manufacture. This training includes study at the Basic Law Enforcement Academy, Criminal Investigator School (CIS) and the ATF New Professional Training (NPT) at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia; as well as the ATF Firearms Interstate Nexus School, which was conducted by officials from the ATF Firearms Technology Branch; the ATF Firearms Trafficking Techniques School. SSA Meade has

personally examined numerous different types of firearms and ammunition throughout his career with ATF. As a Senior Special Agent for ATF, SSA Meade has been assigned the task of an On the Job Training (OJT) instructor for new agents with ATF. SSA Meade has assisted local law enforcement agencies with instruction concerning Project Safe Neighborhoods (PSN) investigations and has conducted training for law enforcement personnel in the field of firearms and firearms identification and classification.

SSA Meade has access to the Firearms Licensing information concerning United States manufacturers, importers and dealers in firearms; including those which are licensed to do business in the State of Texas. SSA Meade also has access to the firearm records which are required to be maintained under Federal Law by those individuals who are licensed by ATF.

In his proposed testimony, SSA Meade will testify about the firearms relevant to this case and whether they have traveled in interstate commerce.

5. Task Force Officer Christian Ledbetter – TFO Ledbetter is a Special Agent/Task Force Officer with the Texas Department of Public Safety and United States Secret Service. His work is primarily with the North Texas Electronic Crimes Task Force.

TFO Ledbetter will testify about his review of images, texts, and videos from the phone seized from Casey Rose. TFO Ledbetter will testify about the dates associated with these images, texts and videos and what phone they were associated with in regards to their creation or receipt.

6. Dallas County Deputy Sheriff Marcella Hale – DSO Hale will take Casey Rose's fingerprints on the day of trial. DSO Hale will testify that she took Mr. Rose's fingerprints and then compared those fingerprints to the fingerprints found on prior convictions of Mr. Rose (Exhibits 43-47) and will then testify as to the results of that comparison. DSO Hale works for the Dallas County Sherriff's Department as a detention service officer, and has worked there since 1990. She specializes in fingerprint analysis and became a fingerprint technician in 1996. She has received extensive training in fingerprint analysis. This includes and 8 hour course in 1991, a 40 hour course in 1996. She has compared hundred, if not thousands of fingerprints in her career.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

s/ P.J. Meitl

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CERTIFICATE OF SERVICE

On August 31, 2015, I electronically submitted the following document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Criminal Procedure 49(b).

s/ P.J. Meitl

P.J. Meitl

Assistant United States Attorney